

Exhibit F

DYFAN'S FIRST SET OF INFRINGEMENT CONTENTIONS

U.S. Patent No. 9,973,899 – Target Corporation

Claims 1-4, 7, 9, 11-19, and 23-30

Dyfan, L.L.C. (“Dyfan”) accuses Target Corporation (“Target”) of infringing claims 1-4, 7, 9, 11-19, and 23-30 of U.S. Patent No. 9,973,899 (hereinafter “the ’899 Patent”). Dyfan provides the following claim chart. *See* Exhibit A.

This claim chart provides Target notice of identified instrumentalities (including “the Accused System”) that incorporate or reflect the recited claim elements. This claim chart is not intended to be an expert report on infringement or provide detailed analysis of the claim terms or infringement. This claim chart includes information related to an assertion of infringement with respect to identified Target products and services, including diagrams, web page screenshots, and other documentary evidence by way of example and not by way of limitation.

The asserted claims include elements that are implemented, at least in part, by instrumentalities described in confidential information not accessible to Plaintiff. In some instances, the precise processes and algorithms used are, at least in part, not publicly available. An analysis of Target’s (or other third parties’) technical documentation and/or software source code may be necessary to more fully identify all infringing features and functionality. Accordingly, Dyfan reserves the right to supplement these contentions once such information is made available to Dyfan. Furthermore, Dyfan reserves the right to revise these contentions, as appropriate, upon issuance of the Court’s Claim Construction Order.

Target makes, uses, sells, imports, or offers for sale in the United States, or has made, used sold, imported, or offered for sale in the past, without authority, products, equipment, or services that infringe claims 1-4, 7, 9, 11-19, and 23-30 of the ’899 Patent, including without limitation, the Target mobile application for iOS [Apple Store ID Number 297430070] or Android [Play Store ID com.target.ui] in conjunction with back-end server(s) and in-store beacon broadcasting units. The claim chart refers to the Accused System and the aforementioned products are included in (or can operate in conjunction with) the Accused System, as noted in the claim chart. To the extent the below claim chart relies on evidence for the Accused System, Dyfan asserts that, on information and belief, any similarly-functioning system also infringes the charted claim. Dyfan reserves the right to amend these infringement contentions with other products made, used, sold, imported, or offered for sale by Target. Dyfan also reserves the right to amend these infringement contentions by citing other claims of the ’899 Patent, not listed in the claim chart, that are infringed by the Accused System. Dyfan further reserves the right to amend these infringement contentions by adding, subtracting, or otherwise modifying content in the “Accused System” section. To the extent there are any differences between the accused instrumentalities and the following claim elements, any such differences are insubstantial and are alleged to infringe under the doctrine of equivalents.

EXHIBIT A

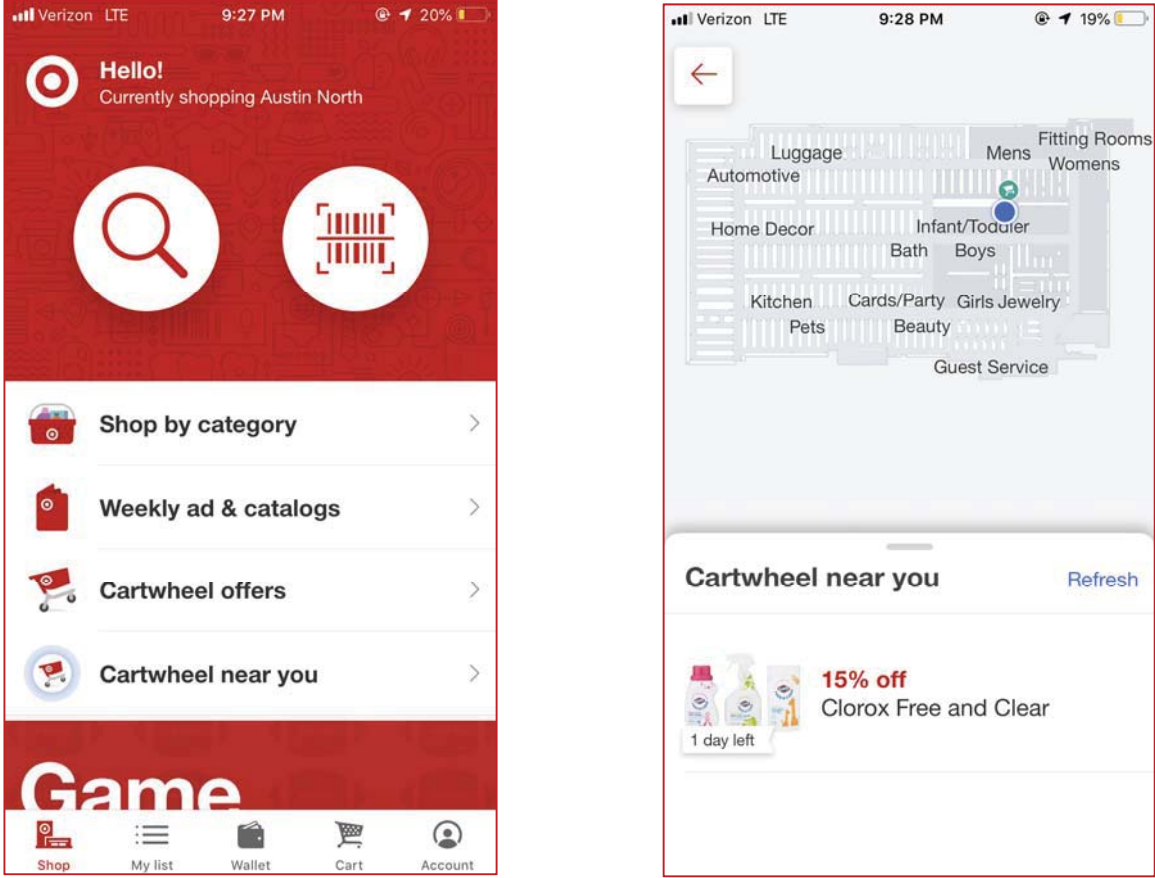
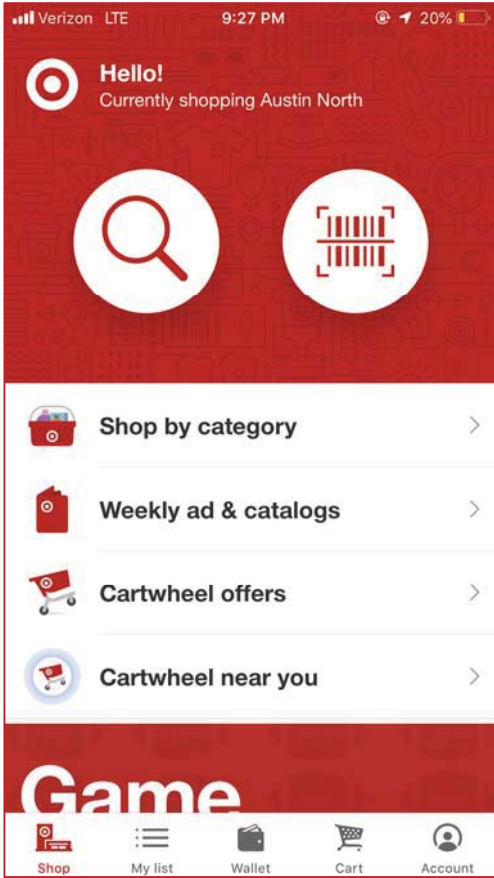
	 <p>In addition to the above description, one or more of Target's stores, mobile app, in-store beacons, or backend servers may satisfy this element under the doctrine of equivalents.</p>
<p>the building includes a shopping mall and the computer code is specific to at least one of a plurality of shopping malls including the shopping mall;</p>	<p>Target stores are a part of a <i>shopping mall</i> (e.g., an outdoor strip mall in which the building that includes the Target store includes other facilities, an indoor shopping mall, or a standalone Target store that includes a café, coffee shop, and/or restaurant in the store separated from the retail shopping area). Upon information and belief, at least a portion of the Target application is specific to at least one shopping mall (e.g., displaying that the user is shopping at the <i>Austin North</i> Target store, presenting customized per-store or per-region weekly ads, etc.).</p>

EXHIBIT A

	 <p>In addition to the above description, one or more of Target's stores, mobile app, in-store beacons, or backend servers may satisfy this element under the doctrine of equivalents.</p>
the plurality of facilities include different private facilities associated with different brands;	Upon information and belief, <i>the plurality of facilities include different private facilities</i> (e.g., different stores including, but not limited to, Pizza Hut, Starbucks, Macy's, clothing companies, home goods companies, electronics companies etc.) <i>associated with different brands</i> .
each broadcast short-range	As explained above, Target uses a first beacon broadcast unit (e.g., a first broadcast short-range